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DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service
Mid-Atlantic Region

Food and Drug Administration
Waterview Corporate Center
10 Waterview Blvd., 3rd Floor
Parsippany, NJ 07054

Telephone (201) 331-2906

July 30, 1997

WARNING LETTER

Norman Braunstein
President
DermaRite Industries
168 East Main Street
Prospect Park, New Jersey 07508

RELEASE
REVIEWED BY: C.O. 8/4/97 DATE

Dear Mr. Braunstein:

File No: 97-NWJ-44

An inspection of your facility located at 168 East Main Street, Prospect Park, NJ was conducted between June 24 - July 2, 1997. During this inspection our investigators documented serious deviations from the Current Good Manufacturing Practice Regulations (Title 21, Code of Federal Regulations, Parts 210 & 211) in conjunction with your firm's manufacture, processing, packing, and holding of various drug products.

Examples of these deviations were noted on the form FDA-483, List of Inspectional Observations, presented to you at the close of the inspection on July 2, 1997. These CGMP deficiencies cause your products to be adulterated within the meaning of Section 501(a)(2)(B) of the Federal Food, Drug, and Cosmetic Act.

The significant observations are as follows:

1) There was no quality control unit that had the authority to release and/or reject drug products, approve master batch records, approve procedures, or evaluate drug products and firm practices from a quality perspective.

2) Your firm has not performed validation studies to support the manufacturing processes for any of the pharmaceutical products.

3) Pharmaceutical finished products and in-process products were manufactured and released without testing to support their strength, purity, chemical and microbiological quality.

4) Your firm had no established stability program designed to assess the characteristics of drug products throughout their expiry period, nor was there analytical data to support the expiry periods of any drug products.

5) Your firm performed no testing on raw materials to evaluate their strength, purity, or quality prior to release for manufacturing. Additionally, the reliability of the suppliers' analyses of these materials was not evaluated.

6) Your firm had no system in place to conduct investigations. During the manufacture of PeriGuard lot [redacted] an unknown solid material was observed during filling. There was no investigation regarding this solid material. Additionally, nine cases of PeriGuard lot [redacted] were shipped prior to determining the composition of the solid material.

7) Regarding master batch records and production batch records:

a) There was no control with regard to the issuance and storage of executed batch records. For example, the batch record for lot [redacted] was misplaced and you instructed an employee to duplicate the record.

b) The review of executed batch records to determine compliance with written procedures was not adequate. Temperatures and mixing times were not recorded as required for Perigiene lot [redacted] and GelRite liquid lot [redacted] respectively. These process deviations were not evaluated and the products were released for shipment

c) Master batch records were not specific with regard to critical processing parameters, in that they lacked defined details such as mixing times and speeds.

d) Master batch records did not contain all the elements required by the Good Manufacturing Practice regulations such as: signatures and dates of approval, a description of the dosage form, a statement of potency, statements of theoretical yield at appropriate stages of processing.

e) Executed batch records were incomplete in that they did not contain statements of theoretical and actual yield, including maximum and minimum percentages of theoretical yield allowed; and each piece of equipment used during manufacturing was not identified.

8) Your firm lacked a formal change control procedure for changes made in the manufacturing processes of pharmaceutical products. For example, a formulation change was made to PeriGuard Ointment. This change consisted of the addition of [redacted] pounds of Parafin Wax. The change was not evaluated to determine how it effected product quality, there was no justification for the change, and no stability data was available for the product manufactured with the revised formulation.

9) Your firm has not validated deionized water system, in that you have not demonstrated that it is capable of producing water of consistent quality. The water produced by the deionized system was not consistently tested for microbial quality, and you have not established any specifications for the chemical and microbial quality of the water. Water samples were only tested four times between the installation of the system on 7/31/95 and the conclusion of the inspection on 7/2/97. Of the four samples analyzed, three showed the total bacterial counts (TBC) ranging from [redacted] All three of these samples also showed the presence of gram negative bacteria. Your firm conducted no investigations with regard to the high bacterial counts nor was the effect on product quality determined.

10) Preservative effectiveness testing on your pharmaceutical products has not been conducted. The ability of the products preservative systems to prevent growth of microorganisms has not been demonstrated, especially in an instance when ingredient water tested at a level as high as [redacted] could have been used.

11) Cleaning validation studies have not been conducted for non-dedicated equipment. Additionally, the cleaning procedure for batching vessels was incomplete in that it did not include a description of the method and materials used for cleaning, and no cleaning procedures existed for any of the hoses, hand held mixers, or stationary mixers used in the manufacturing, processing and packaging of pharmaceutical products.

We have reviewed your memorandum dated July 9, 1997 written in response to the FDA-483, List of Inspectional Observations issued to you at the close of the inspection. We have the following comments regarding your response.

The memorandum is incomplete and does not satisfactorily address the concerns we have regarding your pharmaceutical products. It does not list specific corrective actions you will make in order to correct the observations and prevent similar deviations from occurring in the future. We also expect you to provide time frames for the corrective actions to be implemented.

During the inspection, the investigators noted that you inquired how to obtain a copy of the Good Manufacturing Practice Regulations. We are enclosing a copy of the regulations (21 CFR, Parts 210 & 211) as well as several other guidance documents to assist you in making your corrective actions. You may want to

review these documents and evaluate your operation from a global perspective rather than merely correcting the issues listed on the FDA-483.

The above identification of violations is not intended to be an all-inclusive list of deficiencies at your facility. It is your responsibility to assure adherence to each requirement of the Good Manufacturing Practice Regulations. Federal agencies are advised of the issuance of all warning letters about drugs so that they may take this information into account when considering the award of contracts.

You should take prompt action to correct these deviations. Failure to promptly correct these deviations may result in regulatory action without further notice. Possible action include seizure and/or injunction.

Please notify this office within 15 working days of receipt of this letter of the specific steps you have taken to correct the noted violations. This should include an explanation of each step taken to prevent the recurrence of similar violations. If the corrective actions cannot be completed within 15 working days, state the reason for the delay and the time needed to complete the corrections.

Please submit your response to: U.S. Food and Drug Administration, 10 Waterview Boulevard, 3rd Floor, Parsippany, New Jersey 07054, Attn: Sarah A. Della Fave, acting Compliance Officer.

Sincerely,

Douglas I. Ellsworth

Douglas I. Ellsworth
District Director
New Jersey District

- CERTIFIED MAIL -
RETURN RECEIPT REQUESTED

Enclosures:
21 CFR, Parts 210 & 211
Guide to Inspections of Topical Drug Products
Guide to Inspection of Validation of Cleaning Processes
Guide to Inspections of Microbiological Pharmaceutical Quality Control Laboratories
Guide to Inspections of Pharmaceutical Quality Control Laboratories